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February 21, 2020

By ECF and E-mail

Honorable Stuart M. Bernstein
U.S. Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, New York 10004
bernstein.chambers@nysb.uscourts.gov

Re: Sama v. Mullaney, et al. (In re WonderWork, Inc.), No. 18-ap-1873

Dear Judge Bernstein:

We represent Defendant Brian Mullaney in this adversary proceeding, and write pursuant to the order on Defendants' motions to dismiss the initial complaint (ECF Doc. #71).

Defendants conferred concerning the amended complaint filed February 14, 2020, and all Defendants intend to respond by moving for relief pursuant to Rule 12(b)(6). The Defendants have proposed to Plaintiff the following briefing schedule: motions to be filed by March 20, 2020; opposition due April 17, 2020; replies due May 1, 2020. Plaintiff agreed to the proposed schedule, subject to the Court's determining that further motion practice is appropriate in light of the decision on Defendants' motions to dismiss the initial complaint (ECF Doc. #70). As prior Court authorization is not needed to move to dismiss (cf. Local Bankruptcy Rule 7056-1(a)), we respectfully request that the Court approve the foregoing briefing schedule.

Very truly yours,

/s/ Bijan Amini

Bijan Amini

Granted
SMB
2/24/20

cc: counsel of record (by ECF)